

Leonard and Susan Weeks, owners and operators of Tire Warehouse of Greenfield
Greenfield, MA 01301-1384
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To the Members of the Department of Energy Resources,

We believe burning wood to produce electricity negatively impacts Massachusetts' forests. It also affects public health, lowering air quality and contributing to excess greenhouse gas emissions. We support using public resources for energy conservation.

In 2011, Massachusetts citizens requested a moratorium on all biomass electricity generation facilities for three years in order to fully study their financial, environmental, and public health implications. Former Secretary Ian Bowles' recommendation was a compromise, stating such projects must achieve 60% efficiency to qualify for renewable energy credits.

Thankfully, the DOER's April 2012 version of the biomass regulations are even better. The carbon accounting mechanism has been adjusted to the generally accepted principle that forest residues do not have the same carbon profile as live, carbon-sequestering trees. These adjustments protect forest ecology from severe over harvesting by creating minimum retention standards for residues, and placing some limits on the amount of residues that can be taken from the forest floor.

However, the Manomet study, upon which these regulations are presumably based, use 75% efficiency for Combined Heat and Power. So we ask the DOER to require a minimum efficiency for all biomass electricity generators of 60%. This would apply even to the "advanced" systems that your proposed regulations would reward with subsidies at 40% efficiency in order to be eligible for any of the public's money.

Also, the proposed regulations exclude "Merchantable Bioproducts" from the calculations of efficiency standards. This omission has no precedent in any state or country's regulations, and completely ignores scientific accounting methods. It assumes that the creation of these bioproducts does not involve the use of energy and does not waste energy in the manufacturing process. We ask that the calculations for "Merchantable Bioproducts" be corrected to reflect a life cycle analysis of this process, and hold to the 60% efficiency threshold for renewable energy credits.

Lastly, we question allowing licensed foresters to be the agents signing off on compliance with your proposed guidelines for harvest limits. Those who are being paid by land owners to harvest for biomass would not be neutral. We therefore request the inclusion of additional measures to correct this inherent conflict of interest.

Most Massachusetts residents would agree that our forested lands first and foremost are resources for clean air, clear water, and wildlife habitat. We ask that the DOER continue to re-evaluate biomass harvesting guidelines with an eye toward maximum forest health and greenhouse gas sequestering capacity. In this way we can lead the nation in slowing global warming.

Thank you so much for your efforts toward establishing standards which minimize the negative impacts of biomass energy production.

Sincerely, Leonard and Susan Weeks and Family